

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**UBIQUITOUS CONNECTIVITY, LP,  
Plaintiff,**

**v.**

**CITY OF SAN ANTONIO, by and through  
its agent, CITY PUBLIC SERVICE  
BOARD OF SAN ANTONIO, d/b/a CPS  
ENERGY,  
Defendant.**

**CIVIL ACTION NO. 5:20-cv-00815**

**JURY TRIAL DEMANDED**

**CPS ENERGY’S THIRD UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
ANSWER COMPLAINT**

Defendant City of San Antonio, by and through its agent, City Public Service Board of San Antonio, d/b/a CPS Energy, (“CPS Energy”) without waiving any defenses described or referred to in Federal Rule 12, moves to extend the time to object to, respond to, move, or otherwise answer Plaintiff Ubiquitous Connectivity, LP’s Complaint by 15 days. Plaintiff does not oppose CPS Energy’s requested third extension. The current deadline to answer is October 28, 2020. The extended deadline would be November 12, 2020.

This motion is not made for delay, but only to permit orderly resolution of issues in the case.

Wherefore, CPS Energy respectfully requests that the Court extend the time to object to, respond to, move, or otherwise answer the Complaint by 15 days, until November 12, 2020.

Dated: October 27, 2020

Respectfully submitted,

**FISH & RICHARDSON P.C.**

By: /s/ Neil J. McNabnay

Neil J. McNabnay  
Texas Bar No. 24002583  
mcnabnay@fr.com  
Ricardo J. Bonilla  
Texas Bar No. 24082704  
rbonilla@fr.com  
Rodeen Talebi  
Texas Bar No. 24103958  
talebi@fr.com  
1717 Main Street, Suite 5000  
Dallas, Texas 75201  
(214) 747-5070 – Telephone  
(214) 747-2091 – Facsimile

**ATTORNEYS FOR DEFENDANT  
CITY OF SAN ANTONIO,  
by and through its agent, CITY PUBLIC  
SERVICE BOARD OF SAN ANTONIO,  
d/b/a CPS ENERGY**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on October 27, 2020, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Neil J. McNabnay

Neil J. McNabnay